

Letter for Submission to Docket 13-24

Request #1 - During the recent TEDPA/NASRA conference call with the Federal Communication Commission (FCC), it was requested by FCC staff for TEDPA to provide recommended language designed explicitly for third-party certifier qualifying consumers for IP CTS equipment to consider as part of the rules regarding IP CTS's third-party certifier procedures.

Background Information

- Currently, "for those existing users who received equipment for free or at a price below \$75 from an IP CTS provider (CaptionCall Sorenson, CapTel Ultratec, ClearCaptions Purple) directly or indirectly (other than through a governmental program) prior to March 7, 2013, providers must obtain from the user either a payment of \$75 or a certification from an independent, third party professional that (1) the consumer has a hearing loss that necessitates use of captioned telephone service and (2) the third party professional understands that the captions on captioned telephone service are provided by a live communications assistant funded through the federal TRS program. The Commission's rules also require that the third-party professional certification include the professional's name, title, address, telephone number, and e-mail address."
- IP CTS providers are not required to get third-party certification of new users who are receiving equipment for less than \$75.00. The FCC is working on a Further Notice of Proposed Rulemaking (FNPRM). One component of the FNPRM would require third-party certification. The FCC has received verbal assurance from the majority of IP CTS providers that even though they are not required to obtain third party certification at this time they are still obtaining them in anticipation of the new ruling.
- The independent third-party professional providing certification must be qualified to evaluate an
 individual's hearing loss in accordance with applicable professional standards, and must be either a
 physician, audiologist, or other hearing-related professional.
- State EDP's are doing a good job of assessing individuals to determine which technology/equipment provides them with the most functionally equivalent access to telephone service. In many situations, individuals initially seeking captioned telephones from state EDPs ultimately decide after assessment that a good quality amplified telephone (with or without tone control) more appropriately meets their needs. There is not an objective measure such as decibel level of loss or speech discrimination score used by EDP's to determine eligibility; rather, the assessments are more functional and involve having the applicant try different pieces of equipment to determine which will work the best. Eligibility requirements to receive services from state EDP's vary, and not every state has an EDP program. (3 states, Delaware, Michigan and New York, plus District of Columbia, do not have an EDP program).
- The FCC does not require state EDP's to obtain third-party certification prior to distributing IP CTS equipment.
- State EDP administrators and state TRS administrators have concerns that professionals signing the
 third-party certification are doing so with little or no assessment and/or discussion with the patient of
 whether other technology such as amplified telephones (with or without tone control) would provide
 the most functionally equivalent access to telephone service.
- The time and/or cost and ability of providing an assessment may be an issue for some IP CTS providers.
- The ability of the FCC to monitor and enforce any provision is also a consideration.

TEDPA Recommended Language

Where the IP CTS equipment is or has been obtained by a consumer from an IP CTS provider, directly or indirectly (other than through a governmental program), at no charge or for less than \$75 the IP CTS provider must obtain a certification from an independent third-party professional that:

- 1) the consumer has a hearing loss that necessitates use of captioned telephone service;
- 2) an amplified telephone (with or without tone control) is not sufficient to provide functionally equivalent access to telephone service as determined by a *functional* assessment of the consumer by the third-party professional;
- 3) the third party professional understands that the captions on captioned telephone service are provided by a live communications assistant funded through the federal TRS program and has advised consumer of same; and
- 4) the independent third-party professional providing certification must be qualified to evaluate an individual's hearing loss in accordance with applicable professional standards, and must be either a physician, audiologist, or other state certified or licensed hearing-related professional.

Captioned Telephone Attrition Rate Survey

Request #2 - The FCC is also interested in knowing how many states have EDP programs and also the attrition rate for those who are receiving captioned telephones. This information will indicate to the FCC that state EDP performs a thorough functional assessment with consumers requesting a captioned telephone.

Attrition rate is defined as someone receiving a captioned telephone who then returns the phone or ceases to use it. This does <u>not</u> include phones return due to defectiveness or malfunctioning.

TEDPA Member States Only

Please classify your attrition rate for captioned telephone by selecting one of the following terms: *very low (less than 5%), low (5%-10%), moderate (11%-15%), high (16%-20%) or very high (21% or more).* For the sake of this survey, please use January 1, 2014 to December 31, 2014 as the date-range parameters.

AR	low	LA	very low	PA	not tracked
AZ	low (6.5%)	MA		RI	
CA		ME		SC	
CO	low	MD	very low	SD	A
FL	low (5.3%)	MN	low - moderate	TN	
GA	very low	МО	very low	TX	not tracked
IA		MT	not tracked	UT	
ID		NC	very low	VT	
IL		NV		VA	
IN	low	NM	very low	WA	
KS	very low	ОК	very low	WI	not tracked
KY	very low	OR		WY	very low

notifications@tedpa.basecamphq.com>

Wed, Feb 15, 2017 at 12:40 PM

Reply-To: Messages <U349F5F40E785P101372073-reply@tedpa.basecamphq.com>

To: James Forstall <iforstall@ftri.org>

Reply ABOVE THIS LINE to add a comment to this message

Project:

Messages

Company: TEDPA

posted a new message:

Question on what FCC allows for captioned phone marketing

So I just received a new marketing flier from CaptionCall for "Hearing-Care Professionals." It explains "How to Talk About CaptionCall."

- 1. Ask the simple question, "Do you have a hard time hearing on the telephone?" Or "Do you have to keep asking people to repeat themselves on the phone?"
- 2. Introduce CaptionCall. Hand them a brochure. Use a single introductory statement like, "It's an amazing amplified phone with a large screen that displays written caption of what your calls say!" Emphasize how easy it is to use.

So my question is....does the FCC allow them to advertise this device as an "amplified phone?" Statement two is how the company are wording their device. Just wondering as this was mentioned by the FCC at the last conference and how they are making restrictions on how these devices can be marketed.

Thanks.

knotifications@tedpa.basecamphq.com>

Wed, Feb 15, 2017 at 1:37 PM

Reply-To: Messages <U349F5F40E785P101372073-reply@tedpa.basecamphq.com>
To: James Forstall <jforstall@ftri.org>

Reply ABOVE THIS LINE to add a comment to this message

Project:

Messages

Company:

TEDPA



Question on what FCC allows for captioned phone marketing

This is SO frustrating...it's exactly why there's a problem. I'm of the opinion that the captioned phones shouldn't even HAVE amplification. It should be specifically for people with such a profound hearing loss that they rely strictly on the captions. Maybe the all or nothing is a bit extreme but this is what leads to abuse of the CTS minutes.

notifications@tedpa.basecamphq.com>

Wed, Feb 15, 2017 at 1:49 PM

Reply-To: Messages <U349F5F40E785P101372073-reply@tedpa.basecamphq.com>
To: James Forstall <iforstall@ftri.org>

Reply ABOVE THIS LINE to add a comment to this message

Project:

Messages

Company:

TEDPA

commented on the message:

Question on what FCC allows for captioned phone marketing

Hello All!

I agree that it's frustrating because Captel, CaptionCall, Clear Caption, etc... are being competitive with our State TEDP programs. I'm curious about FCC policy on those companies. Also do they "bribe" audiologist offices and hearing aids offices as incentive? I had couple of places that refuse to take my TEDP program information to share with their customers. Even the I have explained to them that customers do have the option of either amplified phone or captioned phone. Wondering what FCC will or can do?

Thanks,

notifications@tedpa.basecamphq.com> Reply-To: Messages <U349F5F40E785P101372073-reply@tedpa.basecamphq.com> To: James Forstall <jforstall@ftri.org>

Wed, Feb 15, 2017 at 2:08 PM

Reply ABOVE THIS LINE to add a comment to this message

Project:

Messages

Company:

TEDPA



pmmented on the message:

I have a different perspective.

To me, amplification in addition to captioning is beneficial for many customers; however, I do not support that companies require captioning to be used if the person could benefit from only amplification. For instance, a hard of hearing customer who is familiar with the tone and voice/speech patterns of certain family members or friends may not need captioning, but need amplification to speak with them on the phone. In other circumstances, that same individual may need captioning (and amplification) for calls to businesses, etc. The individual should be able to determine whether they need amplification, captioning, or both. Another scenario is one spouse needs captioning (and amplification) and the other only needs amplification. The companies should be required to "divorce" the two, but of course, that means potential loss of revenue.

notifications@tedpa.basecamphq.com>

Wed, Feb 15, 2017 at 4:00 PM

Reply-To: Messages <U349F5F40E785P101372073-reply@tedpa.basecamphq.com> To: James Forstall <jforstall@ftri.org>

Reply ABOVE THIS LINE to add a comment to this message

Project:

Messages

Company:

TEDPA

commented on the message:

Question on what FCC allows for captioned phone marketing

If these were traditional VCO-type phones, with all the voice recognition speed and interaction, but NO sound, we wouldn't even have a discussion because almost NO one would want it. The marketing I've seen addresses hearing level first. Banners at health fairs for "Mild - green", "Moderate - orange" and "Severe - red". When we consult, we literally talk people out of it, most of the time. When I train/evaluate them, I kiddingly tell them I'm going to fine them \$100 if they say "What?" "Huh?" or the like. The funny thing is that I had a rep drop by here and said that he's personally installed over 1,500 phones and has only had 2 people want to return them. I knew what he was made of right there. My filter was off and I politely called him out, saying that we both know that just because a person's qualification is that they are breathing and have a hearing loss, does not mean that captioned phone is fo r them.

It's a matter of being ethical, the way I see it. Interpreters have a Code of Ethics; Code of Professional Conduct. Just sayin'.

<notifications@tedpa.basecamphq.com>

Reply-To: Messages <U349F5F40E785P101372073-reply@tedpa.basecamphq.com>

To: James Forstall < jforstall@ftri.org>

Wed, Feb 15, 2017 at 2:15 PM

Reply ABOVE THIS LINE to add a comment to this message

Project:

Messages

Company:

TEDPA

commented on the message:

Question on what FCC allows for captioned phone marketing

I see your point Jon. I think having sound on the phone is important as it goes hand in hand when reading the captions. But this phone only provides 40 db and I feel they are advertising it as an amplified phone "first."

I think sometimes if a person hears and reads it at the same time, perhaps psychologically they think they are hearing it better.

However, if there are delays in the captions, as all captioned phones experience this this, then the speech and the captions aren't at the same speed. So they aren't really hearing it at the same time to get that benefit.

For our state, we want to make sure that each individual is getting the right device for his/her needs. So if one person needs an amplified phone and the other a captioned phone, I encourage both individuals apply.

I do appreciate TEDPA members share feedback. It helps us better educate ourselves and therefore educate our community.

Thanks!

Complaint from a TEDPA Member

James Forstall < jforstall@ftri.org>

Fri, Feb 10, 2017 at 6:31 PM

To: Karen Peltz Strauss < Karen. Strauss@fcc.gov>, Eliot Greenwald < Eliot. Greenwald@fcc.gov>

This from a 5th state...

This is all very good information to know. Thanks everyone for your input.

We, too, had an incident recently in which Voc Rehab was having trouble with their CapTels. It was such a struggle getting help for them. I was referred to various people before I finally reached someone who would help. It took a few months to get everything resolved.

They are on a very active and aggressive campaign to get phones in every audiologist's office in the state...but offer little if no assistance beyond that. I've had audiologists call us asking for help. This is poor customer service.

[Quoted text hidden]

[Quoted text hidden]
[Quoted text hidden]



notifications@tedpa.basecamphq.com>

Wed, Feb 15, 2017 at 12:40 PM

Reply-To: Messages <U349F5F40E785P101372073-reply@tedpa.basecamphq.com> To: James Forstall <iforstall@ftri.org>

Reply ABOVE THIS LINE to add a comment to this message

Project:

Messages

Company: TEDPA

posted a new message:

Question on what FCC allows for captioned phone marketing

So I just received a new marketing flier from CaptionCall for "Hearing-Care Professionals." It explains "How to Talk About CaptionCall."

- 1. Ask the simple question, "Do you have a hard time hearing on the telephone?" Or "Do you have to keep asking people to repeat themselves on the phone?"
- 2. Introduce CaptionCall. Hand them a brochure. Use a single introductory statement like, "It's an amazing amplified phone with a large screen that displays written caption of what your calls say!" Emphasize how easy it is to use.

So my question is....does the FCC allow them to advertise this device as an "amplified phone?" Statement two is how the company are wording their device. Just wondering as this was mentioned by the FCC at the last conference and how they are making restrictions on how these devices can be marketed.

Thanks.

<notifications@tedpa.basecamphq.com>

Wed, Feb 15, 2017 at 1:37 PM

Reply-To: Messages <U349F5F40E785P101372073-reply@tedpa.basecamphq.com>
To: James Forstall <jforstall@ftri.org>

Reply ABOVE THIS LINE to add a comment to this message

Project:

Messages

Company:

TEDPA



Cuestion on what FCC allows for captioned phone marketing

This is SO frustrating...it's exactly why there's a problem. I'm of the opinion that the captioned phones shouldn't even HAVE amplification. It should be specifically for people with such a profound hearing loss that they rely strictly on the captions. Maybe the all or nothing is a bit extreme but this is what leads to abuse of the CTS minutes.



James Forstall < jforstall@ftri.org>

Complaint from a TEDPA Member

James Forstall <iforstall@ftri.org>

Thu, Feb 9, 2017 at 1:10 PM

To: Eliot Greenwald <Eliot.Greenwald@fcc.gov>, Suzy Rosen Singleton <Suzanne.Singleton@fcc.gov>, Karen Peltz Strauss <karen.strauss@fcc.gov>

I've intentionally left the name of the filer off.

Another reason for the importance of proper screening and education

I've met with our local relay service provider and public utilities commission about what's going on with captioned phone marketing. And just today I get another call from a consumer who wants to return his captioned phone because he didn't like it.

The consumer said that the captioned phone company told him to call me but he didn't get it from our program as he said he just filled out a one page paper. I explained that the captioned company also offers a program at no charge.

He was very frustrated from the device and by now didn't even want to hear about other options. I tried to explain an amplified phone but I think he just got so frustrated with what he got, he has given up on any option.

So this is just another example of the importance of educating a consumer at the beginning on the options.

Just thought I'd air this out again. ;)

Thanks for listening....

Thanks

James

James Forstall, Executive Director Florida Telecommunications Relay Inc. (FTRI) 1820 E Park Avenue, Suite 101 Tallahassee, FL 32301 jforstall@ftri.org 850-270-2641 (VP)

Please like us on Facebook



James Forstall < jforstall@ftri.org>

(no subject)

James Forstall <iforstall@ftri.org> Wed, Feb 15, 2017 at 3:15 PM To: Karen Peltz Strauss <karen.strauss@fcc.gov>, Eliot Greenwald <Eliot.Greenwald@fcc.gov>

Karen and Eliot,

I've been out of the office on business travel that past three days however TEDPA members have been busy with IP-CTS situation, see below.

Question on what FCC allows for captioned phone marketing

So I just received a new marketing flier from CaptionCall for "Hearing-Care Professionals." It explains "How to Talk About CaptionCall."

- 1. Ask the simple question, "Do you have a hard time hearing on the telephone?" Or "Do you have to keep asking people to repeat themselves on the phone?"
- 2. Introduce CaptionCall. Hand them a brochure. Use a single introductory statement like, "It's an amazing amplified phone with a large screen that displays written caption of what your calls say!" Emphasize how easy it is to use.

So my question is....does the FCC allow them to advertise this device as an "amplified phone?" Statement two is how the company are wording their device. Just wondering as this was mentioned by the FCC at the last conference and how they are making restrictions on how these devices can be marketed.

Question on what FCC allows for captioned phone marketing

This is SO frustrating...it's exactly why there's a problem. I'm of the opinion that the captioned phones shouldn't even HAVE amplification. It should be specifically for people with such a profound hearing loss that they rely strictly on the captions. Maybe the all or nothing is a bit extreme but this is what leads to abuse of the CTS minutes.

Question on what FCC allows for captioned phone marketing

Hello All!

I agree that it's frustrating because Captel, CaptionCall, Clear Caption, etc... are being competitive with our State TEDP programs. I'm curious about FCC policy on those companies. Also do they "bribe" audiologist offices and hearing aids offices as incentive? I had couple of places that refuse to take my TEDP program information to share with their customers. Even tho I have explained to them that customers do have the option of

either amplified phone or captioned phone. Wondering what FCC will or can do?

Question on what FCC allows for captioned phone marketing

I have a different perspective.

To me, amplification in addition to captioning is beneficial for many customers; however, I do not support that companies require captioning to be used if the person could benefit from only amplification. For instance, a hard of hearing customer who is familiar with the tone and voice/speech patterns of certain family members or friends may not need captioning, but need amplification to speak with them on the phone. In other circumstances, that same individual may need captioning (and amplification) for calls to businesses, etc. The individual should be able to determine whether they need amplification, captioning, or both. Another scenario is one spouse needs captioning (and amplification) and the other only needs amplification. The companies should be required to "divorce" the two, but of course, that means potential loss of revenue.

Question on what FCC allows for captioned phone marketing

I see your point XXX. I think having sound on the phone is important as it goes hand in hand when reading the captions. But this phone only provides 40 db and I feel they are advertising it as an amplified phone "first."

I think sometimes if a person hears and reads it at the same time, perhaps psychologically they think they are hearing it better.

However, if there are delays in the captions, as all captioned phones experience this this, then the speech and the captions aren't at the same speed. So they aren't really hearing it at the same time to get that benefit.

For our state, we want to make sure that each individual is getting the right device for his/her needs. So if one person needs an amplified phone and the other a captioned phone, I encourage both individuals apply.

I do appreciate TEDPA members share feedback. It helps us better educate ourselves and therefore educate our community.

Please let me know if you have any questions or wish to talk.

Thanks

James

James Forstall, Executive Director Florida Telecommunications Relay Inc. (FTRI) 1820 E Park Avenue, Suite 101 Tallahassee, FL 32301



James Forstall <jforstall@ftri.org>

Complaint from a TEDPA Member

James Forstall < jforstall@ftri.org> Thu, Feb 9, 2017 at 3:06 PM To: Eliot Greenwald <Eliot.Greenwald@fcc.gov>, Suzy Rosen Singleton <Suzanne.Singleton@fcc.gov>, Karen Peltz Strauss < karen.strauss@fcc.gov>

Here's a message from a different member of TEDPA.

this happens in every time a commercial is on TV. I have to remind Captel to inform consumers that we will assess their needs and not necessary get a Captel, Also, the commercial tends to be misleading and doesn't explain how the phone works.

[Quoted text hidden]

CaptionCall Presentation Review FSHHP Conference 7.15.2017 Elissa Moran

The presentation was given by Teresa Shipman, AuD and her colleague Rich McCuen.

The stated theme of the presentation was the importance of visual cues to people who have hearing loss, specifically captioning. Results of various studies were presented that indicated television captioning provided greater access to spoken words than hearing aids alone did. The understanding is that although hearing aids improve some forms of communication, access to TV soundtracks is increased dramatically when those viewers use closed captioning.

That portion of the presentation took less than ten minutes. It was followed with some statistics about consumers and hearing aids:

- Consumers are reluctant to purchase hearing aids because they don't believe that hearing aids will improve their difficulty hearing on the phone
- 82% of people polled want hearing aids that work better for using the phone
- Only 50% reported notable benefits of using hearing aids for phone conversations

Dr. Shipman then went on to use those findings to support CaptionCall's position that ALL people with hearing loss should be using her product, not just those with severe or profound loss.

She suggested that audiologists and hearing aid specialists start referring all patients to CaptionCall, because even those with a 'mild' or 'moderate' loss on paper (audiogram) still rely on visual cues for effective communication, which means captioning for all phone calls. No mention was made about amplified phones and their impact on improving communication. The words "amplified phones" were never spoken, and the two types of phone call methods were not compared.

After Dr. Shipman highlighted some of the phone's other features such as built-in answering machine, ability to save conversations, and 58 dB boost button (the only captioned phone to have that capability certified by a third party) and new iPad app, she recounted a story from the Orlando Sentinel, where an elderly woman was able to assist the authorities catch a phone scammer because she had saved the script of his calls to her.

Rick took the microphone to give the audience a brief history of CaptionCall and it's parent company, Sorenson Communications. He claimed that CaptionCall was the first and for a while the only caption telephone company to offer 'Red Carpet' service to include in-home installation and support. He talked about the captioned telephone (of all brands) \$75 purchase price instituted by the FCC in 2010, and CaptionCall's legal fight against that ruling to ensure access for disadvantaged consumers, but did not expand on the reason the FCC felt that was warranted in the first place. He also did not mention that consumers could avoid that fee by having their hearing loss certified by a third party, or by a State Equipment Distribution Program. Indeed, he left out completely the part about CaptionCall at one point wanting those very state programs to provide those certifications to CaptionCall customers to appease the FCC's concerns that their phones were being given to people who did not actually need them.

As I was listening, several thoughts occurred to me:

- Can they support the oft-repeated claim that CaptionCall does indeed refer clients to state programs if they are now taking the position that everyone who has a hearing loss of any sort should have a CaptionCall phone?
- What does the FCC think about CaptionCall's position that all people with all levels of hearing loss need a captioned telephone? As of this writing, a specific threshold of hearing loss is not required in order to be eligible for a captioned telephone, but language used by the FCC makes clear there is emphasis on ensuring only people who need the captioning service have access to it.
- What is the potential impact on the IP CTS Fund that pays for all captioning service? If they are successful in distributing their phones in the manner they seek, will the fund be able to support the increased demand? Will there be another funding emergency such as was experienced in 2010, in which Sorenson was a major player?
- Is CaptionCall positioning itself to suggest it is entitled to a portion of state program funding? Are they concerned about the potential negative impact on state programs?

As was expected, there was a Q and A session at the end of the presentation. Dr. Shipman asked how many in the audience (of about 100) were currently sending clients to CaptionCall- about 30% raised their hands. If these folks start referring ALL their clients to CaptionCall, that could translate into a significant number of people receiving phones they may not actually need (because amplified phones would actually be sufficient for them).

There was a question about the necessary internet access. CaptionCall will provide a landline to a client without one (via the internet connection), but they cannot provide the internet. Dr. Shipman suggested some options such as congregate housing wi-fi, government programs like Lifeline, and calling the internet provider to ask for a discount. She did not mention that captioned phones were available from the Florida state program.

The day before her presentation I visited the CaptionCall booth, and chatted with both her and Rick. I shared with them my observation that many of the attendees (audiologists and hearing aid specialists) did not realize that consumers are allowed to have BOTH federally-funded and state-funded phones, and asked her point-blank to correct that misunderstanding during her presentation. She and Rick indicated their willingness to do that, although they refused to mention the brand name CapTeI, which I good naturedly agreed would be too much to expect. That said, I left the conversation fully expecting her to make good on her promise to at least clear up the confusion that consumers area allowed to participate in both programs. She made no mention of state programs.

I was disappointed in the presentation. It is impossible for me to believe any claims about CaptionCall supporting state programs based on what I witnessed. When I took my turn during the Q and A session to inform the audience that the Florida program offered a captioned phone that did not require internet access, it was clear that was annoying to the CaptionCall team. Although FTRI and other state programs have been known to make good faith efforts to refer clients to CaptionCall when needed, there is no evidence that CaptionCall reciprocates.



James Forstall <jforstall@ftri.org>

Fwd: [NASRA General Forum] Request from Rolka Loube: IPCTS Tactics from Providers

E Moran <emoran@ftri.org> To: James Forstall <jforstall@ftri.org>

Here is the email string to Dave Rolka.

Elissa Moran Outreach Manager Florida Telecommunications Relay, Inc. 1820 E. Park Ave. Tallahassee, FL 32301 800-222-3448

Begin forwarded message:

From: Elissa Moran <emoran@ftri.org> Date: October 16, 2017 at 11:44:56 AM EDT

To: Dave Rolka <drolka@rolkaloube.com>, Sharon.Lee@fcc.gov

Subject: Re: [NASRA General Forum] Request from Rolka Loube: IPCTS Tactics from Providers

Good morning Dave and Sharon,

I'm happy to help in any way I can.

After re-reading my email to you, I realized that I left something out. When I used the term "CapTel Rep", I should have added that it was likely an OEI employee functioning as a CapTel rep. OEI has a strong presence here in Florida. As you likely already know, OEI is a spin-off from Ultratec, the CapTeI manufacturer. http://www.oeius.org

Please let me know if you have further questions.

Thank you, Elissa

Elissa Moran Outreach Manager Florida Telecommunications Relay, Inc (FTRI) 1820 E Park Avenue, Suite 101 Tallahassee, FL 32301 emoran@ftri.org 850-329-8227



On Oct 12, 2017, at 9:42 AM, Dave Rolka drolka@rolkaloube.com> wrote:

Good morning Elissa, and thank you very much for the detailed information. The rumors of these transactions have been very troubling to information with the FCC and will get back to you if we have further questions. Again thank you for responding to the inquiry.

Dave

David W. Rolka, President 4423 N. Front Street Harrisburg, PA 17110 717-585-6605 ext 602

From: Elissa Moran [mailto:emoran@ftri.org] Sent: Friday, October 06, 2017 10:48 AM

To: Dave Rolka

Subject: Fwd: [NASRA General Forum] Request from Rolka Loube: IPCTS Tactics from Providers

Florida Telecommunications Relay, Inc. Mail - Fwd: [NASRA General Forum] Request from Rolka Loube: IPCTS Tactics from Providers

Hi Dave,

Great to see you in Colorado!

I'm writing in response to this email to the NASRA membership, sent on your behalf.

I am one of the people that your email asks about...

Dr. Lyndsay Nalu from Sarasota and Lakewood Ranch Florida is the audiologist who reported the activity to me. I would say she told me in either late July or August of this year, leaving me with the sense that the incident took place earlier thi

It was the CapTel rep from the Sarasota FL area who requested Dr. Nalu sign a stack of blank application/certification forms. I do not know if that rep made the request on their own, or at the direction of their management.

Let me know if you have additional questions, or if I can help in any way!

Thank you, Elissa

Elissa Moran Outreach Manager Florida Telecommunications Relay, Inc (FTRI) 1820 E Park Avenue, Suite 101 Tallahassee, FL 32301 emoran@ftri.org 850-329-8227

<image001.jpg>

Begin forwarded message:

From: Holly Bise < notifications@nasra.basecamphq.com >

Subject: [NASRA General Forum] Request from Rolka Loube: IPCTS Tactics from Providers

Date: October 4, 2017 at 12:02:25 PM EDT

To: Elissa Moran <emoran@ftri.org>

Reply-To: NASRA General Forum < <u>U7549F89BC192P103633326-reply@nasra.basecamphq.com</u>>

Reply ABOVE THIS LINE to add a comment to this message

Project:

NASRA General Forum

Company: NASRA



Holly Bise posted a new message:

Request from Rolka Loube: IPCTS Tactics from Providers

Hello NASRA,

Dave Rolka with Rolka Loube has asked me to share the request below. If you have any information that could be bene Thank you.

From Dave:

"While I was attending the meetings in Colorado, I was told that a service provider was rumored to have presented aud that clients, that they had perhaps never seen, were certified to need a captioned phone, then the provider could distrik heard the story more than once, but did not know who was reporting it, or where it might have occurred, or for that mat you have heard this or similar reports, I would appreciate any additional information that you might be able to share wit happened, the provider or the doctor or even the city or state where it allegedly occurred. As you might imagine we are information that we have in order to identify patterns that lead us to discover additional information.

11/20/2017

Demand for IP CTS is currently outpacing the provider's projections. We are concerned that the growth is driven by eli intended to expand demand among a population that may not be eligible for the service."

David W. Rolka, President 4423 N. Front Street Harrisburg, PA 17110 717-585-6605 ext 602 drolka@rolkaloube.com

This message was sent to Alan Solomon, Andy Leffler, Barbara Keefe, Barbara Varnum, Becky Rosenthal, Beth Blackmer, Betty Hammond, Bill Nye, Bob D Chris Rozycki, Clayton Bowen, Connie Bandt, Curtis Humphries, Curtis Williams, David Weiss, Deborah O'Willow, Elaine Williams, Elissa Moran, Eric Jesch Seaman, Greg Gantt, Holly Bise, James Forstall, Jan Withers, Jay Stone, Jim Stevens, Jodi Goodenough, John Birznieks, John Manaois, Johna Strader, Jc Babineaux, Kari Munn, Katie Gran, Lisa Cooper, Lori Cielinski, Lynn Franquemont, Melissa Derr, Monique Brazelton, Nathan Gomme, Patty Moody-D'Angel Garrow, Sabrina Fields, Sara Sack, Sharon Colby Camara, Sherri Collins, Steve Stovall, Steven Peck, Sunni Eriksen, Susan Travis, Trudy Snell, and Virgin Stop receiving emails when comments are posted to this message. Prefer plain text emails?

Delivered by Basecamp



Questions? Call: 1-877-557-2227 | Email: support@captioncall.com

Home

(mailto:support@captioncall.com)

CUSTOMER LOG IN (HTTPS://LOGIN.CAPTIONCALL.COM/CCCOMINTERNAL/CMSPAGES/CCLOGON.ASPX)

REQUEST PHONE (HTTPS://REQUEST.CAPTIONCALL.COM/CAPTIONCALLLEADS/CREATECOMMITTEDLEAD)

Earn CEU credit as you learn about captioned telephone service

Courses Available

• Captioned Telephone Service 101

View Course

(http://www.audiologyonline.com/audiology-

ceus/course/captioned-telephone-service-

101-27403)

• The Importance of Television Closed Captioning and Captioned Telephone Service for People with Hearing Loss

View Course

(http://www.audiologyonline.com/audiologyceus/course/importance-television-closed-

captioning-and-28715)





Course Abstract

People with hearing loss are at a distinct disadvantage compared to people with normal hearing when communicating on the telephone. This course discusses eligibility requirements for patients to receive a captioning telephone from CaptionCall.

Course Learning Outcomes

- Participants will be able to identify eligibility requirements from the FCC to receive a captioning phone.
- $\cdot \ \mathsf{Participants} \ \mathsf{will} \ \mathsf{be} \ \mathsf{able} \ \mathsf{to} \ \mathsf{demonstrate} \ \mathsf{the} \ \mathsf{functionality} \ \mathsf{of} \ \mathsf{the} \ \mathsf{CaptionCall} \ \mathsf{phone}, \ \mathsf{CaptionCall} \ \mathsf{Mobile} \ \mathsf{and} \ \mathsf{CaptionCall} \ \mathsf{service}.$
- · Participants will be able to discuss how to submit a Professional Certification Form.

The Importance of Television Closed Captioning and Captioned Telephone Service for People with Hearing Loss

Course Abstract

This course discusses how Television Closed Captioning and Captioned Telephone Service have been shown to help those with hearing loss have a better understanding of speech on the television and telephone.

Course Learning Outcomes

- · Participants will be able to identify assistive devices that can improve understanding of speech on the Television and Telephone.
- · Participants will be able to describe research and data on the success of captioning and speech understanding.
- · Participants will be able to describe the eligibility requirements in order to receive a free captioning telephone.

Hearing-care & Healthcare Professionals

Program Overview

(Click on the topic of interest below)

- Why offer CaptionCall? (http://captioncall.com/professionalsprogram/#whyOffer)
- Free with Professional Certification (http://captioncall.com/professionalsprogram/#freeWithCert)
- Patient Eligibility
 (http://captioncall.com/professionals-program/#patientElig)
- How to Order CaptionCall (http://captioncall.com/professionalsprogram/#noahMod)
- Red-carpet Service (http://captioncall.com/professionalsprogram/#redCarpet)
- Who can Certify Hearing Loss (http://captioncall.com/professionalsprogram/#whoCan)
- Regulations Compliance
 (http://captioncall.com/professionals-program/#markReg)
- Videos Professionals Discuss (http://captioncall.com/professionalsprogram/#videos)



CaptionCall Recognizes Outstanding **Audiology Students**

CaptionCall is pleased to announce that five outstanding audiology students have been chosen this year as recipients of the CaptionCall scholarship. Each student will receive \$3,000. This is the first year CaptionCall has awarded its scholarship. More than 80 students applied.

"We created the CaptionCall scholarship as a way to support the field of audiology," says Bruce Peterson, CaptionCall vice president of marketing. "We know that audiologists fill a critical role in helping individuals with hearing loss make choices to stay connected and to enjoy a high quality of life."

The winners of the 2017 CaptionCall scholarship are:

Jaclyn DeRosso

Shae Morgan

Kelly Smith

Karen Woldt

Claire Umeda

Pacific University, Oregon

University of Utah

University of South Florida

Vanderbilt University, Tennessee

Nova Southeastern University, Florida

Sound Business

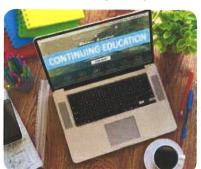
Being Better Than the Competition

Being successful means standing out from the rest, but this is not a simple task. In fact, it might be one of the most difficult goals to achieve when it comes to any business. In the Success.com article "5 Ways to Make Your Business Better Than the Competition," they've listed the following ways to adapt your mindset and approach competition to come out on top.

- 1. **Find a blue ocean.** An industry feels crowded when everyone is doing the same thing. Look for "blue ocean" opportunities-those that have not been explored to their full potential.
- 2. **Be bold.** If you want to stand out from your peers, you must not be afraid to speak up and go against the status quo. From research and development to sales and marketing to customer service, take bold steps.
- 3. Answer the underlying question. Ask yourself, What is it that the consumer really needs that isn't already available? Identify it, and then provide it.
- 4. Become the expert. What makes a company great is its ability to translate one service into a complete lifestyle approach. Create a business that is fullcircle so your target audience is reliant on more aspects of the brand.
- 5. Look to other successful industries for inspiration. In a crowded industry, playing the "me too" game eventually leads to a downward spiral of price competition. What will keep you one step ahead of your peers is to find inspiration from leaders in other industries. Take innovation clues and shape them into what works for your company.

Hearing Healthcare Providers Rave About the CaptionCall CEU Courses

- 5 stars "She provided good information and statistics that can be helpful when counseling patients." ~ Shey
- 5 stars "Something very different yet very important. I will apply this information to patients in the clinic." ~ Wendy
- **5 stars** "Helping patients with TV and telephone is a priority and this course gave some good tips." ~ Robert



Two courses are available:

- · Captioned Telephone Service 101
- The Importance of TV Closed Captioning & Captioned Telephone Service for People with Hearing Loss

For more information, visit https://captioncall.com/earn-ceu-credit/



History of Advocacy

From day one, CaptionCall has been an advocate for people with hearing loss, enabling easy, no-cost access to captioned telephone service (CTS). When CaptionCall came on the scene in 2011 with a revolutionary new phone and service, and made it available at NO COST to qualified individuals, it really rocked the industry. Many who could not afford our competitor's price for CTS could finally enjoy this service.

Historically, CapTel-affiliated distributors have been strong proponents of charging the consumer or state agencies for their captioning phones. Not wanting to give their phones away, they lobbied the FCC to require consumers with a hearing loss to pay for a captioning phone. The FCC responded by issuing regulations requiring CaptionCall, and other CTS providers, to charge a minimum of \$75 for the phone.



CaptionCall was the only CTS provider who filed a Stay Request in the D.C. Circuit Court of Appeals, arguing that the new FCC regulations violated the rights of people with hearing loss as guaranteed by the ADA. Our Stay Request was granted, and the courts ruled in favor of CaptionCall. We continue to offer the phone at no cost to anyone who has a certified hearing loss.

We will continue to stand as a strong advocate for the rights of people with hearing loss as granted by the ADA. Thank you for supporting our cause!

Red-Carpet Service



"I had no idea how rewarding this would be!"

Trudy Erisman is the CaptionCall Account Manager for Kansas. She loves her 3 children, her "most amazing grandkids" and working for CaptionCall.

"I started with CaptionCall as a trainer/installer a year ago. I accepted the position as Account Manager in October. I feel very fortunate to work for such a great company. I really had no idea how rewarding this would be, and I have been blessed to see people reconnect on the phone and in life ... love it!!"

Trudy Erisman, CaptionCall Account Manager

Ordering CaptionCall

Two Choices-One Easy Step

Rave Reviews

Practitioners Love It!

"CaptionCall has helped our patients stay involved socially with their friends and family, helped them to keep up with business they need to conduct, and ultimately it has improved their quality of life. And they make it easy for us to provide CaptionCall to our patients by streamlining the process. I highly recommend CaptionCall!"

Darcy Bension, Au.D. Owner of California Hearing Center

Patients Love it!

After 70 years I am able to answer the phone for myself. This is the first time since WWII I can understand the whole conversation. Talk about freedom! I have had other 'helps' from my audiologist, but none ever gave me the total understanding of what was being said to me quite like CaptionCall. Thank you so much!



Stan – WWII Veteran

Families Love It!

"My mother had all but given up on trying to communicate by phone. I have received calls from my brother and my sisters, who tell me that they can now have a normal conversation with our mother — something that just hasn't been possible before. I can't tell you how happy my mom is now that she can communicate with the family again. I think your phone is fantastic!"



compelling reasons to share CaptionCall with your patients.





Signup Now to start sharing CaptionCall with your eligible patients!

Ann, Family Caregiver

COMPLIMENTARY PHONE and FREE CAPTIONING SERVIC



Captioning Excellence

smooth flow of captions and easy reading. in smaller groupings of text to the phone's screen for a remarkably CaptionCall offers SilkScroll™—a feature that that sends captions

to finish on every call, regardless of how long the conversation lasts CaptionCall offers the fastest captioning service available, from start

Accurate

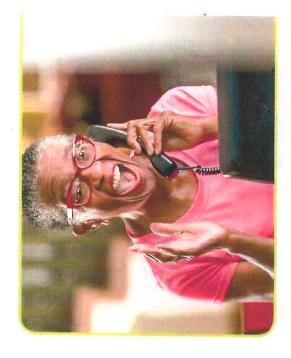
patients the most accurate captioning experience possible CaptionCall boasts a caption accuracy rate of 96%, guaranteeing your



of people with hearing loss as for supporting our cause! granted by the ADA. Thank you strong advocate for the rights We will continue to stand as a







Convenient

Simplified Ordering

You just sign and submit the certification form ... Caption Call does the rest! Here are 2 easy options for submitting the certification form:

CaptionCall Module for Noah 4

Using the Noah 4 Module for CaptionCall, you can submit the certification form for

amplification settings for their CaptionCall phone. Visit CaptionCall integrates with your patient's audiogram to recommend specific your patients in just a few keystrokes. The module automatically com and download the module from the 'Professionals' page, or contact your local CaptionCall representative for the download.

Printed or Digital Certification Form ai

The form is available through our website or your local CaptionCall Complete a printed or digital version of the certification form and submit it via email or fax following the instructions on the form. representative.

Audio Excellence

Amazing Amplification

Industry Association (TIA-4953) for your patients with mild, moderate or severe hearing loss. We also meet the TIA standard set for hearing CaptionCall is the only captioning telephone that meets the strict amplification standards established by the Telecommunications aid compatibility and reduced interference (TIA-1083) for an unmatched audio experience.

TIA-4953 Compliance

TIA-1083 Compliance











Given a nominal input level of 80 dB SPL, here are the CaptionCall output levels:

- Ringer volume—up to 105 dB SPL
- Handset volume in boost mode—up to 121.5 dB SPL

Binaural Listening

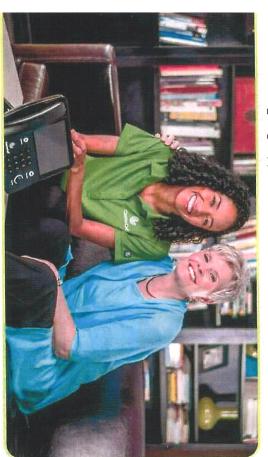
Your patients appreciate having the option to listen to their callers with art speakerphone system optimized with advanced audio processing. CaptionCall comes equipped with RealSound® audio – a state-of-theboth ears.



Red-Carpet Service

In addition to the NO-COST CaptionCall phone, customers rave about our legendary red-carpet treatment, including:

- Free delivery
- Free installation
- Free in-home training
- Free ongoing support



Our friendly CaptionCall Trainers personally deliver and install the phone for your patient's, and don't leave their home until they are comfortable making and answering calls.

You will also appreciate that our Trainers are CaptionCall employees, not contracted labor. Our skilled, friendly employees are committed to rolling out the red-carpet for your patients.



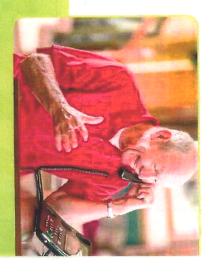
Build Your Business



Added Value for Your Practice

When you make CaptionCall part of your daily patient offering, you will:

- Build patient loyalty by solving a serious problem in their lives
- Re-engage with tested-not-sold patients
- Reduce hearing aid returns due to phone utility
- Refresh your ads with a unique offer to drive new and repeat traffic





April 6, 2017

Greetings from CaptionCall.

Please enjoy the enclosed GOLD STANDARD booklet identifying 7 compelling reasons to share CaptionCall with all your eligible patients.

At CaptionCall we are obsessed with helping you keep your patients socially engaged for a longer, happier, healthier life!

Thank you,

Jeff Bradford Senior Director of Marketing Jbradford@captioncall.com

•	